



THE CITY OF SAN DIEGO

January 26, 2009

Office of Planning and Research
P.O. Box 3022
Sacramento, CA 95812-3044

Subject: Preliminary draft CEQA Guideline Amendments for Greenhouse Gas Emissions,
dated January 8 2009

The City of San Diego has reviewed the preliminary draft CEQA Guideline Amendments for Greenhouse Gas Emissions, dated January 8 2009 proposed by the Office of Planning and Research (OPR). Our comments are specifically regarding the proposed modifications of the CEQA Initial Study Checklist under the Transportation/Traffic Section. OPR's proposal is as follows:

XVI. TRANSPORTATION/TRAFFIC -- *Would the project:*

a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., +~~Result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on the roads, or congestion at intersections) roadway vehicle volume or vehicle miles traveled?

b) ~~Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?~~

eb) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

dc) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

ed) Result in inadequate emergency access?

f) ~~Result in inadequate parking capacity?~~

ef) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?



The City's comments to OPR's above proposed revisions are as follows:

1) The collective delay of vehicles on a roadway is one way to measure greenhouse gas emission levels. Measuring the cumulative delay of vehicles on a roadway is a good indication of the time vehicles are sitting in traffic. Less delay means less idling of vehicles which effectively could result in a reduction of greenhouse gas emissions. Delays on a roadway impacts autos, trucks and transit and should be considered as an important initial check for environmental impacts. We support the measure of vehicle miles traveled (VMT), as proposed, and believe VMT should be included in the checklist. However, the above proposed deletion of measuring capacity and level-of-service should remain and written as follows:

- a) Leave as originally stated in (a) above.
- b) Exceed either individually or cumulatively, a level of service standard established by the local agencies.
- c) Add a measure of vehicle miles traveled.

2) Deleting parking capacity is essentially ignoring parking demand in our communities. Providing too much parking or not enough parking can both be a problem for communities and a region but neglecting to acknowledge a need is not recommended. We propose to maintain the "Result in inadequate parking capacity" measure as originally stated.

Sincerely,



Patti Boekamp
Director
Engineering and Capital Projects

cc: Job Nelson, Director of Intergovernmental Relations
Deborah Van Wanseele, Deputy Director, Transportation Engineering
Linda Marabia, Senior Traffic Engineer